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PLEASE REPLY TO  
NEW JERSEY OFFICE

February 18, 2011

**VIA ECF**

Hon. Michael A. Shipp, U.S.M.J.  
District of New Jersey  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

RE: Renaissance Carpet and Tapestries, Inc. v. S&H Rugs, Inc. et al.  
Civil Action No. 09-CV-00632 (SRC-MAS)

Dear Judge Shipp:

We represent Defendants S&H Rugs, Inc. and Ori Wilbush in the above-referenced matter. We received Plaintiff's Motion for Sanctions for Spoliation of Evidence yesterday afternoon. Upon review of the motion, it is clear that two weeks is not sufficient time to prepare opposition. Then I said that two weeks was adequate to prepare a reply. In light of the nature of the allegations made, the breadth of the discovery in this case (approximately 60,000 documents that have been produced) and the extraordinary remedies and sanctions sought, I now realize three-four weeks will be necessary to prepare a reply.

I also have a short trial that is currently scheduled to begin March 2, 2011 and a discovery cutoff that likely will require our participation in approximately 8 depositions over the next 30 days.

Adversary counsel declined our request for a 30-days adjournment of the return date. We note that Plaintiff was granted leave to make this motion in December and the motion reflects the time that was taken to prepare it. Accordingly, we request that motion be carried two motion cycles, to April 18, 2011, and that our opposition be served and filed on April 4, 2011. Thank you for your attention to this matter.

Hon. Michael A. Shipp, U.S.M.J.

February 18, 2011

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Very truly yours,

A handwritten signature in black ink, appearing to read "Jay R. McDaniel", written in a cursive style.

Jay R. McDaniel

CC: Ronald Meister, Esq. (*via ECF and email*)

Ori Wilbush (*via email*)